

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF VIRGINIA
(Alexandria Division)**

IN RE:

ROBERT ALAN VALIERE

Debtor

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**Case No. 13-15612-RGM
Chapter 7**

TRUSTEE'S MOTION FOR TURNOVER

Klinette H. Kindred, Trustee, moves the Court for entry of an Order requiring the Debtor to turnover to the Trustee a statement from Penn Mutual Life Insurance confirming the cash value of the policy on the filing date, December 18, 2013, and to turnover any cash value in excess of \$5,998, and in support of this motion states the following:

1. The debtor filed a voluntary chapter 7 bankruptcy on December 18, 2013;
2. The debtor appeared at his creditors' meeting on January 22, 2014;
3. On Schedule B the debtor listed a life insurance policy with Penn Mutual with a cash value of \$7,500;
4. The Trustee requested a copy of the statement confirming the cash value;
5. The debtor timely filed a homestead deed protecting \$5,998 of the cash value in the policy;
6. The Trustee has made repeated requests for the statement and to date has not received the statement confirming the cash value on the petition filing date, December 18, 2013.

WHEREFORE, the Trustee asks the Court for an Order requiring the Debtor to turnover to the Trustee a statement from Penn Mutual Life Insurance confirming the cash value of the

policy on the filing date, December 18, 2013, and to turnover any cash value in excess of \$5,998.

Respectfully submitted,

/s/ Klinette H. Kindred
Klinette H. Kindred, Trustee (VSB # 18000)
Tyler, Bartl, Ramsdell & Counts, P.L.C.
300 North Washington Street, Suite 202
Alexandria, Virginia 22314
(703) 549-5000

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2014, a true copy of the foregoing Motion was, to the extent that the following person(s) were not served electronically via the CM/ECF system, served via regular mail, first class postage prepaid, to the following parties:

Office of the U.S. Trustee
115 South Union Street, Suite 210
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/s/ Klinette H. Kindred